

Ballstaedt Law Firm, LLC d/b/a Fair Fee Legal Services
 Seth D. Ballstaedt, Esq. Bar # 11516
 Lennie A. Alzate, Esq Bar# 15491
 8751 W Charleston Blvd #230
 Las Vegas, NV 89117
 (702) 715-0000
help@bkvegas.com

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA

)	
)	Case No. 23-10055-mkn
In re:)	Trustee: MCPHERSON
)	
CHRISTONE DISTRIBUTION, INC)	Chapter: 11
)	
Debtor)	Hearing Date: 08/28/2024
)	Hearing Time: 9:30 AM
)	
)	
)	

MOTION TO CLOSE CASE

CHRISTONE DISTRIBUTION, INC (hereinafter referred to as “debtor” and “Applicant”),
 by and through her attorney, Lennie A. Alzate., hereby filed this Motion to close the case. And
 states as follows:

Statement of Facts

1. On January 7, 2023, (the “Petition Date”), the Debtor filed its voluntary petition for relief under chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”), thereby commencing its bankruptcy case (the “Chapter 11 Case”). The Debtor elected to be treated under Subchapter V of chapter 11 of the Bankruptcy Code [ECF No. 1], and thus was authorized to continue operating its business as a debtor in possession pursuant to §1184 of the Bankruptcy Code. Jeanette McPherson was appointed as Subchapter V Trustee in the Debtor’s Chapter 11 Case [ECF No. 5].
2. On Order Confirming Debtor’s Plan of Reorganization was entered on the docket of the court on April 26, 2024 (Dkt #168).

3. Debtor has been making plan payments and intends to continue to make payments until its obligations are paid in full
4. Upon completion of plan payments, the Debtor intends to reopen its case for the purpose of obtaining a discharge.
5. The Debtor requests this honorable court grant this motion to close the instant case, with the intent to reopen for discharge upon completion of plan payments.

Statement of Law

6. Administrative Order 2011-03 of the U.S. Bankruptcy Court, District of Nevada states in paragraph five:

“ If the debtor proposed to close the case before the plan payments have been completed, and intends to reopen the case after plan completion to obtain discharge, the debtor shall file a motion to close the case and include in that motion the debtor’s intent to reopen.”

In this case, debtor intends to close the case until the plan payments have been completed, and then intends to reopen the case for the purpose of discharge.

Wherefore, the Debtor respectfully requests that this Honorable Court:

1. Grant the Motion to close the case, with the intention to reopen for discharge upon completion of debtors plan payments
2. Any other just or equitable relief the court deems appropriate.

Dated: 7/17/2024

/s/ Lennie A Alzate, Esq
Lennie A. Alzate, Esq.
Attorney for Debtor